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Attorneys for Cerberus Capital Management, L.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	:	Case No. 12-12020 (MG)
	:	
Debtors.	:	Jointly Administered
	:	
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**NOTICE OF STIPULATION ADOPTING UNIFORM PROTECTIVE ORDER FOR
EXAMINER DISCOVERY FOR PURPOSES OF DISCOVERY OF
CERBERUS CAPITAL MANAGEMENT, L.P. BY
PAULSON & CO., INC.**

PLEASE TAKE NOTICE that non-Debtors Cerberus Capital Management, L.P.
("Cerberus") and Paulson & Co., Inc. ("Paulson") hereby file the *Stipulation Adopting Uniform
Protective Order for Examiner Discovery for Purposes of Discovery of Cerberus Capital
Management, L.P. by Paulson & Co., Inc.*, attached hereto as Exhibit A, in connection with the
*Order (I) Granting Examiner Authority to Issue Subpoenas for the Production of Documents and
Authorizing the Examination of Persons and Entities, (II) Establishing Procedures for
Responding to Those Subpoenas, (III) Approving Establishment of a Document Depository and
Procedures to Govern Use, and (IV) Approving Protective Order*, dated August 20, 2012 [ECF
No. 1223].

Respectfully Submitted,

Dated: February 26, 2013
New York, New York

SCHULTE ROTH & ZABEL LLP

By: /s/ Howard O. Godnick
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